

Nathan R. Ring  
NV State Bar No. 12078  
**STRANCH, JENNINGS & GARVEY, PLLC**  
3100 W. Charleston Boulevard, Suite 208  
Las Vegas, NV 89102  
Telephone: 725.235.9750  
lasvegas@stranchlaw.com

Jeff Ostrow (*admitted pro hac vice*)  
**KOPELOWITZ OSTROW FERGUSON  
WEISELBERG GILBERT**  
One West Las Olas Boulevard, Suite 500  
Fort Lauderdale, FL 33301  
Telephone: 954.525.4100  
ostrow@kolawyers.com  
*Attorneys for Plaintiff and the Proposed Class*

Todd L. Bice  
**PISANELLI BICE PLLC**  
400 S. 7th Street Suite 300  
Las Vegas, NV 89101  
Telephone: 702.214.2100  
tlb@pisanellibice.com

Angela C. Agrusa\*  
**DLA PIPER LLP (US)**  
2000 Avenue of the Stars  
Suite 400 North Tower  
Los Angeles, CA 90067-4735  
Telephone: 310.595.3000  
angela.agrusa@us.dlapiper.com

*\*Pro hac vice application forthcoming*

*Attorneys for Defendant  
MGM Resorts International*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TONYA OWENS, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

MGM RESORTS INTERNATIONAL,

Defendant.

Case No. 2:23-cv-01480-RFB-MDC

**STIPULATION TO EXTEND TIME  
TO FILE DEFENDANT'S  
RESPONSE TO COMPLAINT  
(FOURTH REQUEST)**

Pursuant to LR IA 6-1, Plaintiff Tonya Owens and Defendant MGM Resorts International (“MGM”) (collectively, the “Parties”) respectfully stipulate MGM’s time to respond to the Complaint be extended from the current deadline of March 11, 2024 to and including April 10, 2024. This is the fourth stipulation for an extension of time to file MGM’s responsive pleading. The court previously granted an extension on January 9, 2024. ECF No. 23.

Good cause exists to enlarge the time for MGM to respond to the Complaint. There are currently thirteen other related actions filed against MGM pending in this District (the “Related Actions”). *See Kirwan v. MGM Resorts Int’l*, No. 2:23-cv-01481; *Zussman v. VICI Properties I LLC, et al.*, No. 2:23-cv-01537; *Lackey v. MGM Resorts Int’l*, No. 2:23-cv-01549; *Pircio v. MGM Resorts Int’l*, No. 2:23-cv-01550; *Terezo v. MGM Resorts Int’l*, No. 2:23-cv-01577; *Rundell v. MGM Resorts Int’l*, No. 2:23-cv-01698; *Bezack v. MGM Resorts Int’l*, No. 2:23-cv-01719; *Albrigo v. MGM Resorts Int’l*, No. 2:23-cv-1981; *Zari v. MGM Resorts Int’l*, No. 2:23-cv-01777; *Manson v. MGM Resorts Int’l*, No. 2:23-cv-01826; *Mejia v. MGM Resorts, Int’l*, No. 2:23-cv-00081; *Sloan v. Vici Properties Inc., et al.*, No. 2:23-cv-02042; *Righetti v. MGM Resorts Int’l*, No. 2:23-cv-2064.

On December 6 and December 20, 2023, plaintiffs’ counsel in six consolidated putative class actions brought against MGM by individuals who allege their PII was compromised as a result of a cybersecurity incident involving MGM in 2019 (the “2019 Actions”) filed Notices of Related Cases Pursuant to District of Nevada Local Rule 42.1, notifying the Court that the Related Actions are related to the 2019 Actions. *In re: MGM Resorts Int’l Data Breach Litig.*, No. 2:20-CV-00376-GMN-NJK, ECF Nos. 186, 188. Plaintiffs in this action have opposed this effort because the 2019 Actions involved a different threat actor and different data. No order has issued on the notices filed by the plaintiffs in the 2019 Actions, and MGM has not responded to any other Complaint in the Related Actions.

The parties in the Related Actions are discussing this development in addition to the consolidation of the Related Actions. The parties in the Related Actions have also engaged

1 in preliminary information exchange that may avoid the need for certain motion practice,  
2 which would conserve judicial resources. As such, additional time is required to permit time  
3 to meet and confer with the various parties to the Related Actions.

4 The Parties' request is made in good faith to enable the parties to finalize the joint  
5 motion for consolidation and conserve judicial and party resources. Moreover, this case is  
6 in its infancy, and this request will not prejudice any party.

7 **WHEREAS** the Parties respectfully request that MGM shall have until April 10,  
8 2024, to answer, move, or otherwise respond to the Complaint.

9 Dated: March 7, 2024

Respectfully submitted,

10 By: /s/ Jeff Ostrow

11 Nathan R. Ring  
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15 Jeff Ostrow (*admitted pro hac vice*)  
16 **KOPELOWITZ OSTROW FERGUSON**  
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18 One West Las Olas Boulevard, Suite 500  
19 Fort Lauderdale, FL 33301  
[ostrow@kolawyers.com](mailto:ostrow@kolawyers.com)

*Attorneys for Plaintiff and the Proposed Class*

19 By: /s/ Todd L. Bice

20 Todd L. Bice  
21 **PISANELLI BICE, PLLC**  
22 400 S. 7th Street Suite 300  
23 Las Vegas, NV 89101  
[tlb@pisanellibice.com](mailto:tlb@pisanellibice.com)

24 Angela C. Agrusa  
25 **DLA PIPER LLP (US)**  
26 2000 Avenue of the Stars  
27 Suite 400 North Tower  
28 Los Angeles, CA 90067-4735  
[Angela.agrusa@us.dlapiper.com](mailto:Angela.agrusa@us.dlapiper.com)

*Attorneys for Defendant*  
*MGM Resorts International*

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 TONYA OWENS, individually and on behalf of  
4 all others similarly situated,

5 Plaintiff,

6 v.

7 MGM RESORTS INTERNATIONAL,

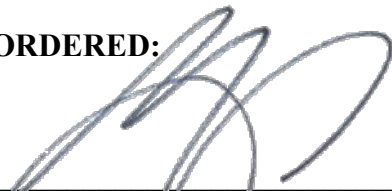
8 Defendant.

Case No. 2:23-cv-1480-JAD-MDC

**[PROPOSED] ORDER GRANTING  
STIPULATION TO EXTEND TIME  
TO FILE DEFENDANT'S  
RESPONSE TO COMPLAINT**

9  
10 Upon consideration of the foregoing stipulation to extend Defendant MGM Resorts  
11 International's time to file response to Plaintiff's Complaint in the above-captioned action,  
12 it is hereby **ORDERED** that the Stipulation is **GRANTED**, and the time for MGM Resorts  
13 International to answer, move, or otherwise respond to Plaintiff's Complaint is hereby  
14 extended to and including April 10, 2024.

15  
16 **IT IS SO ORDERED:**

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19 \_\_\_\_\_  
20 Maximiliano D. Couvillier III  
21 United States Magistrate Judge  
22 DATED: March 8, 2024  
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